

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ROSY GIRON DE REYES; JOSE  
DAGOBERTO REYES; FELIX ALEXIS  
BOLANOS; RUTH RIVAS; YOVANA  
JALDIN SOLIS; ESTEBAN RUBEN MOYA  
YRAPURA; ROSA ELENA AMAYA; and  
HERBERT DAVID SARAVIA CRUZ,

*Plaintiffs,*

vs.

WAPLES MOBILE HOME PARK LIMITED  
PARTNERSHIP; WAPLES PROJECT  
LIMITED PARTNERSHIP; and A.J.  
DWOSKIN & ASSOCIATES, INC.,

*Defendants.*

Civil Action No. 1:16cv00563-TSE-TCB

**MEMORANDUM IN SUPPORT OF PLAINTIFFS’  
MOTION TO FILE DOCUMENTS UNDER SEAL**

Pursuant to Local Civil Rule 5, Plaintiffs Rosy Giron De Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (“Plaintiffs”) submit this memorandum in support of their Motion to File Documents under Seal. The documents that Plaintiffs request permission to file under seal are Exhibits 1-5 to Plaintiffs’ Motions *in Limine*. The exhibits appended to the Motions *in Limine* consist of documents Plaintiffs and Defendants designated confidential pursuant to the Protective Order (Dkt. 45), namely, excerpts from deposition transcripts.<sup>1</sup>

---

<sup>1</sup> Although Defendants did not mark their deposition transcripts as confidential, Plaintiffs file these transcripts under seal out of an abundance of caution.

*Ashcraft v. Conoco, Inc.*, 218 F.3d 282, 288 (4th Cir. 2000), held that documents may be sealed pursuant to district court order when the court: (1) provides notice to the public and gives it an opportunity to object to sealing, (2) considers less drastic alternatives, and (3) provides specific findings in support of the decision to seal and the rejection of alternatives. Those requirements are met here.

First, Plaintiffs have concurrently filed a Notice of Motion to be docketed by the Clerk. The Notice will provide the public with an opportunity to object to the sealing of the documents in question.

Second, no feasible alternative exists to sealing these documents, in light of the Protective Order requiring information designated confidential pursuant to the Order to be filed with the court consistent with Local Rule 5 of the Eastern District of Virginia. Accordingly, the utmost discretion and confidentiality is necessary, and filings in this action should be kept under seal.

For these reasons, Plaintiffs respectfully request that the Court grant Plaintiffs' Motion to File Document under Seal. A proposed order is attached.

Respectfully submitted,

//s//

Dated: January 11, 2021

LEGAL AID JUSTICE CENTER  
Simon Sandoval-Moshenberg, VSB #77110  
Nady Peralta, VSB #91630  
6066 Leesburg Pike, Suite 520  
Falls Church, VA 22041  
Phone: (703) 778-3450  
Fax: (703) 778-3454  
simon@justice4all.org  
nady@justice4all.org

QUINN EMANUEL URQUHART &  
SULLIVAN, LLP  
Kaiyeu Kevin Chu, VSB #85746  
Matthew Traupman (pro hac vice)  
Gianna Puccinelli (pro hac vice)  
1300 I Street NW, Suite 900  
Washington, District of Columbia 20005  
Phone: (202) 538-8000  
Fax: (202) 538-8100  
kevinchu@quinnemanuel.com  
matthewtraupman@quinnemanuel.com  
giannapuccinelli@quinnemanuel.com

*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 11<sup>th</sup> day of January, 2021, I caused the foregoing to be filed electronically with the Clerk of the Court using CM/ECF, which will then send a notification of such filing to all counsel of record.

\_\_\_\_\_/s/\_\_\_\_\_  
Simon Sandoval-Moshenberg (VSB No. 77110)  
*simon@justice4all.org*  
LEGAL AID JUSTICE CENTER  
6066 Leesburg Pike, Suite 520  
Falls Church, VA 22041  
Tel: (703) 720-5605  
Fax: (703) 778-3454

Dated: January 11, 2021